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DEPARTMENT OF TRANSPORTATION

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BAA

From the Group Airports Director

Our ref: AS\MH\AMCD\JAW\664

21 October 1996

Mr Graham Pendlebury  
International Aviation Negotiations 3  
Department of Transport  
Great Minster House  
76 Marsham Street  
London SW1P 4DR

OST-95-950-36

Dear Mr Pendlebury

**US PROPOSAL FOR MANDATORY PASSENGER MANIFEST INFORMATION ON  
FLIGHTS TO AND FROM THE USA**

I have been passed a copy of your letter of 4 October 1996 in connection with a Notice of Proposed Rule Making by the Government of the United States of America. The proposal would require carriers serving the US irrespective of their country of registration to **collect** certain data on US Passport holders and passengers with lawful permanent residence in the us.

BAA is not **opposed** in **principle** to collection of a passenger manifest on flights to and from the US. BAA **does**, however, have **very** strong **reservations** about the practicality of the present proposal and would oppose it in its **present** form.

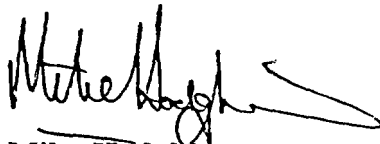
As the owner and operator of seven airports in the UK (Heathrow, Gatwick, Stansted, Southampton, Glasgow, Edinburgh and Aberdeen) BAA **considers** that it would be wholly impractical to require carriers either to obtain such information at check-in areas or to verify the information at check-in areas. At present, the average transaction time at check-in for passengers on US services is around 2.5 to 3.3 minutes depending on the carrier concerned. The consultation paper indicates that this transaction time could be increased by between 40 seconds and 2 minutes. It is simply not possible for BAA to provide the extra check-in capacity that the present proposal would give rise to even if airlines were prepared to pay for the extra costs.

Continued....

From BAA's perspective it would be necessary to find some other means of implementing the proposal. This might involve collecting data at the point of sale and then verifying it at the departure gate immediately before the passengers board the aircraft. However, as the consultation document makes clear, there are difficulties here too.

I am copying this letter to the US Department of Transportation in Washington.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mike Hodgkinson', with a long horizontal flourish extending to the right.

**Mike Hodgkinson**  
**Group Airports Director**